

**From:** [Moncavage, Carissa](#)  
**To:** ["Mwangi, George M. \(DNREC\)"](#)  
**Cc:** [Rebar Jr., John J \(DNREC\)](#); [McFadden, Angela](#); [Trulear, Brian](#)  
**Subject:** MOT pre-notice draft  
**Date:** Wednesday, April 17, 2019 10:16:00 AM

---

Hi George,

Thank you for the extra time to review the pre-notice draft of MOT (DE0050547). I completed my review of the draft permit and fact sheet and have the following comments:

1. Comments related to WET —

- a. The permittee was required to conduct yearly chronic WET tests over the last permit term, and since the application (submitted in 2017) only included WET results from 2013, 2014, and 2015, the fact sheet should include a more detailed discussion of the WET RP analysis that includes test results and test dates used in the analysis. It is unclear as to whether DNREC used only the WET data reported on the application or whether more recent data was also included in the RPA.
- b. The IWC changed from 13% to 49% since the last permit term, this is a significant change and the fact sheet should explain this change in more detail including the flow statistics that were used and, specifically, what changed since the last permit was issued.
- c. Related to my first comment, the fact sheet references the “recent NOEC test results have been 100%,” however, the WET results reported on the application indicate NOEC results for c.dubia of 87.5% and 76.25% for survival and reproduction, respectively. While these results may not change the outcome of the RP analysis, they should be included in the discussion in the fact sheet.
- d. The chronic WET endpoint for this permit was determined to be NOEC, however the application reports both NOEC and LC50 values. The statistical endpoint for chronic wet tests should be NOEC and EC/IC25. The 48hr LC50 and 96hr LC50 reported in the application are the statistical endpoints for acute WET tests. Were acute WET tests also conducted? In other words, what do these values represent and/or how were they interpreted?

2. Comments related Ammonia RP—

- a. The ammonia data included in the RP spreadsheet show elevated concentrations of ammonia for the first three months of 2017, these concentrations (listed below) do not appear to be outliers but rather they indicate a trend. Was the facility experiencing an issue at the treatment plant or did they change their

process resulting in elevated ammonia concentrations in their discharge? Are there ammonia data after 3/23/2017 that show a downward trend of ammonia concentrations? If so, that could demonstrate the issue was resolved, however, the highest concentrations should still be included in the RP analysis/calculations since the higher values do not appear to be outliers.

- b. Related to my first comment, since the previous permit did not require this facility to monitor for ammonia, was there a change in the facility's process that triggered the ammonia sampling?

3/23/2017	9.24	2.223542	1.803613
3/15/17	14.86	2.698673	3.305552
3/8/17	10.52	2.353278	2.168913
3/1/17	2.55	0.936093	0.003084
2/22/17	4.36	1.472472	0.350366
2/16/17	4.21	1.437463	0.310146
2/8/17	3.14	1.144223	0.069521
2/2/17	2	0.693147	0.035122
1/25/17	3.16	1.150572	0.072909
1/18/17	2	0.693147	0.035122
1/12/17	2	0.693147	0.035122
1/4/17	2	0.693147	0.035122

Thanks,

**Carissa Moncavage**

NPDES Permits Branch

U.S. EPA Region 3 | Water Protection Division

1650 Arch Street (3WP41), Philadelphia, PA 19103

Ph: (215) 814-5798 | Fax: (215) 814-2318

(pronouns: she/her)